

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case: 1:21-cr-20239

Judge: Ludington, Thomas L.

MJ: Morris, Patricia T.

Filed: 04-07-2021 At 11:40 AM

SEALED MATTER (tt)

v.

D-1 MICHAEL JOHN TADAJEWSKI,

D-2 TYLER BLAINE MILLER,

Defendants.

INDICTMENT

COUNT ONE

**CONSPIRACY TO STEAL FIREARMS FROM A FEDERALLY
LICENSED FIREARMS DEALER AND POSSESS STOLEN FIREARMS
(18 U.S.C. §§ 371, 922(u), & 922(j))**

1. Beginning in November 2020 and continuing through on or about November 21, 2020, in the Eastern District of Michigan, Northern Division, Michael Tadajewski, Tyler Miller, and Minor Conspirator-1 (MC-1) knowingly and willfully combined, conspired, confederated and agreed together, and with persons known and unknown to the Grand Jury, to commit certain offenses against the United States, that is, to steal

firearms from a federally licensed firearm dealers in violation of Title 18, United States Code, Section 922(u), and to receive, possess, sell, and dispose of stolen firearms in violation of Title 18, United States Code, Section 922(j).

Object of the Conspiracy

2. The object of the conspiracy was to steal and obtain firearms and then sell them for money and profit.

Overt Acts

3. In furtherance of the conspiracy and to achieve the object of the conspiracy, the members of the conspiracy committed the following overt acts, among others, in the Eastern District of Michigan, Northern Division, and elsewhere:
 - a. In November of 2020, Michael Tadajewski, Tyler Miller, and MC-1 researched via the internet Full Bore Firearms, a federally licensed firearms dealer located at 1109 Crittenden Ct., Alpena, MI, 49707, to learn about the gun shop and obtain information to assist them in planning the burglary.
 - b. On or about November 21, 2020, Michael Tadajewski drove Tyler Miller and MC-1 to a wooded area near Full Bore Firearms and

parked the vehicle in a secluded area.

- c. Tyler Miller and MC-1 walked through the woods to the gun shop and threw a rock through a glass window to make entry into the building.
- d. Tyler Miller and MC-1 wore masks, hooded sweatshirts, and gloves to disguise their identities when they burglarized the gun store.
- e. Tyler Miller and MC-1 stole approximately 49 firearms from Full Bore Firearms.
- f. After the burglary Michael Tadajewski, Tyler Miller, and MC-1 used carbide cutters to grind the serial numbers off the guns.
- g. Michael Tadajewski then attempted to sell the stolen firearms.
- h. Michael Tadajewski hid a majority of the weapons that were stolen from Full Bore Firearms in the woods near his home.
- i. On November 24, 2020, Tyler Miller possessed three firearms that were stolen from Full Bore Firearms.

All in violation of Title 18 United States Code, Sections 371, 922(u) and 922(j).

FORFEITURE ALLEGATION- FIREARMS AND AMMUNITION
(18 U.S.C. § 924(d)(1))

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1).

Upon conviction of the offense charged in Count One, Michael Tadajewski and Tyler Miller shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) any firearm or ammunition involved in said offense.

Dated: April 7, 2021

THIS IS A TRUE BILL.

SAIMA S. MOHSIN
Acting United States Attorney

ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

s/GRAND JURY FOREPERSON

s/TIMOTHY TURKELSON
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(P53748)

Companion Case information MUST be completed by AUSA and InitialsUnited States District Court
Eastern District of Michigan**Criminal Case Co**Case: 1:21-cr-20239
Judge: Ludington, Thomas L.
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to co

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|--|-------------------------------|
| Companion Case Information | Companion Case Number: |
| This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : | Judge Assigned: |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | AUSA's Initials: TT |

Case Title: USA v. MICHAEL TADAJEWSKI & TYLER MILLER**County where offense occurred :** ALPENA**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information**Superseding to Case No:** _____ **Judge:** _____


- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

April 7, 2021

Date


 Timothy Turkelson
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 Flint, Michigan 48502
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 P53748

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.